



ASX PRE-QUOTATION DISCLOSURE

11th February 2015

The following information is provided as pre-quotations disclosure:

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1. DISTRIBUTION SCHEDULE

**First Growth Fund Limited
Fully Paid Ordinary Shares
Distribution Schedule
11th February 2015**

Range of Shares	Number of Shareholders
1-1,000	2,497
1,001-5,000	451
5,001-10,000	107
10,001-100,000	196
100,001-max	95
	3,346

2. TOP 20: SHAREHOLDERS

**First Growth Fund Limited
Fully Paid Ordinary Shares – Top 20
Holders**

11th February 2015

1	GEBA PTY LTD	60,800,000	13.6%
2	SAYERS INVESTMENTS (ACT) PTY	45,000,000	10.1%
3	NOBLE INVESTMENTS	29,000,000	6.5%
4	EKE HOLDINGS PTY LTD	24,750,000	5.5%
5	AS & JR LIBBIS PTY LIMITED	21,000,000	4.7%
6	LITTLE BREAKAWAY PTY LTD	17,000,000	3.8%
7	CALABRIA ENTERPRISES PTY LTD	16,000,000	3.6%
8	ETHAN ALLEN INVESTMENTS PTY	15,950,000	3.6%
9	VICEX HOLDINGS PTY LTD	15,000,000	3.4%
10	MUNGALA INVESTMENTS PTY LTD	13,692,865	3.1%
11	ALASTAIR R BROWN PTY LTD	11,000,000	2.5%
12	KORE CAPITAL PTY LTD	10,250,000	2.3%
13	MR ANTHONY CASEY WILSON	9,000,000	2.0%
14	TETS PTY LTD	9,000,000	2.0%
15	SEREC PTY LTD	8,970,000	2.0%
16	NORTHERN STAR NOMINEES PTY LTD	7,220,000	1.6%
17	PYGOCENTRUS PTY LTD	6,500,000	1.5%
18	DALEXT PTY LTD	6,000,000	1.3%
19	MR ALEXANDER SUTHERLAND	5,500,000	1.2%
20	GXB PTY LTD	5,100,000	1.1%
	Top 20 Investors	336,732,865	75.4%
	Other Investors	109,704,251	24.6%
		446,437,116	100.0%

3. CAPITAL STRUCTURE

First Growth Fund Limited Summary Capital Structure 11th February 2015

	Number
Fully Paid Ordinary Shares	446,437,116
Series A New Options	173,570,316
Series B New Options	272,866,800

4. OPTION TERMS

Series A Option Terms

The terms and conditions of the series A Options on issue are:

- (a) Each Series A New Option entitles the holder (**Option Holder**) to subscribe for a Share in the Company at the exercise price of \$0.008 per Share.
- (b) The Series A New Options will expire at 5.00pm (Central Standard Time in Australia) on the first day after the 12th Calendar Month from Reinstatement. Any Series A New Options not exercised on or before the expiry date will automatically lapse.
- (c) The Series A New Options are, subject to any restriction on the Series A New Options vesting in the Option Holder, only exercisable 7 days prior to the Expiry Date, which will be 12 months from the date of Reinstatement.
- (d) All Shares in the Company allotted on the exercise of Series A New Options will rank equally in all respects with the then existing Shares.
- (e) It is intended that application will be made to ASX for quotation of the Series A New Options.
- (f) The Company must apply for quotation of all Shares in the Company allotted pursuant to the exercise of New Options not later than 10 Business Days after the date of allotment.
- (g) A Series A Option Holder may only participate in new issues of securities ("**New Issue**") to holders of Shares in the Company if the New A Options have been exercised and Shares allotted in respect of the New Options before the record date for determining entitlements to the New Issue. The Company must give to the Series A Option Holder at least 7 Business Days' notice of any New Issue before the record date for determining entitlements to the New Issue in accordance with the Listing Rules.
- (h) There will be no change to the exercise price of the Series A New Options or the number of Shares over which the Series A New Options are exercisable in the event of the Company making a pro-rata issue of Shares or other securities to the holders of Shares in the Company (other than a bonus issue).
- (i) If there is a bonus issue ("**Bonus Issue**") to the holders of Shares in the Company, the number of Shares over which the Series A New Options are exercisable will be increased by the number of Shares which an Option Holder would have received if the Option had been exercised before the record date for the Bonus Issue ("**Bonus Shares**"). The Bonus Shares must be paid up by the Company out of the profits or reserves (as the case may be) in the same manner as was applied in the Bonus Issue and upon issue rank equally in all respects with the other Shares on issue as the date of issue of the Bonus Shares.
- (j) If prior to the expiry date there is a re-organisation of the issued capital of the Company, the New Options are to be treated in the manner set out in the Listing Rules.

Series B Option Terms

The terms and conditions of the series B Options on issue are:

- (a) Each Series B New Option entitles the holder (**Option Holder**) to subscribe for a Share in the Company at the exercise price of \$0.02 per Share.
- (b) The Series B New Options will expire at 5.00pm (Central Standard Time in Australia) on the first day after the 36th Calendar Month from Reinstatement. Any Series B New Options not exercised on or before the expiry date will automatically lapse.
- (c) The Series B New Options are, subject to any restriction on the Series B New Options vesting in the Option Holder, only exercisable 7 days prior to the Expiry Date, which will be 36 months from the date of Reinstatement.
- (d) All Shares in the Company allotted on the exercise of Series B New Options will rank equally in all respects with the then existing Shares.
- (e) It is intended that application will be made to ASX for quotation of the Series B New Options.
- (f) The Company must apply for quotation of all Shares in the Company allotted pursuant to the exercise of Series B New Options not later than 10 Business Days after the date of allotment.
- (g) A Series B Option Holder may only participate in new issues of securities ("**New Issue**") to holders of Shares in the Company if the New B Options have been exercised and Shares allotted in respect of the New Options before the record date for determining entitlements to the New Issue. The Company must give to the Series B Option Holder at least 7 Business Days' notice of any New Issue before the record date for determining entitlements to the New Issue in accordance with the Listing Rules.
- (h) There will be no change to the exercise price of the Series B New Options or the number of Shares over which the Series B New Options are exercisable in the event of the Company making a pro-rata issue of Shares or other securities to the holders of Shares in the Company (other than a bonus issue).
- (i) If there is a bonus issue ("**Bonus Issue**") to the holders of Shares in the Company, the number of Shares over which the Series B New Options are exercisable will be increased by the number of Shares which an Option Holder would have received if the Option had been exercised before the record date for the Bonus Issue ("**Bonus Shares**"). The Bonus Shares must be paid up by the Company out of the profits or reserves (as the case may be) in the same manner as was applied in the Bonus Issue and upon issue rank equally in all respects with the other Shares on issue as the date of issue of the Bonus Shares.
- (j) If prior to the expiry date there is a re-organisation of the issued capital of the Company, the Series B New Options are to be treated in the manner set out in the Listing Rules.

5. PRO FORMA BALANCE SHEET

	Consolidated	
	Audited June 2014 \$	Pro Forma December 2014 \$
Assets		
Current Assets		
Cash & cash equivalents	143,572	1,248,072
Trade & other receivables	21,707	21,708
Total current assets	165,279	1,269,780
Non-current assets		
Investments accounted for using the equity method	300,460	300,459
Total non-current assets	300,460	300,459
Total assets	465,738	1,570,239
Liabilities		
Current liabilities		
Trade & other payables	122,786	72,786
Borrowings *	800,000	800,000
Total current liabilities	922,786	872,786
Total liabilities	922,786	872,786
Net (liabilities)/ assets	(457,048)	697,453
Equity		
Contributed equity	53,125,154	54,498,807
Accumulated losses	(53,582,202)	(53,801,354)
Equity attributable to the owners of First Growth Funds Limited	(457,048)	697,453
Total (deficiency)/equity	(457,048)	697,453

*The Company has granted the Secured Creditor a security interest in the Bluefish Technologies Pty Ltd ('Bluefish') shares held by the Company as collateral for repayment of the moneys owed to the Secured Creditor, limited to \$800,000('Security Interest') as well as 50% of any proceeds from the Bluefish shares over and above the \$800,000. Therefor while the Company has a current obligation to repay \$800,000 and this amount has been recorded as a liability in the statement of financial position as at 30 June 2014 if the Company does not sell, or is not able to sell, the Bluefish shares, and if the Company does not wish to pay the Secured Creditor the \$800,000, then the Company can transfer its interests in Bluefish to the Secured Creditor, subject to shareholder pre-emptive rights. The Company's liability in respect of this asset is therefore limited to the sale value of the Bluefish shares and to \$800,000. If the shares are eventually sold for a lesser figure than the \$800,000, with approval of, or demand from, the Secured Creditor, then the Company will have no further liability to the Secured Creditor.

6. EXPENDITURE BUDGET

The Company has raised \$1,500,000 pursuant to the public offer. The Company intends to apply the funds raised under the public offer as follows (exclusive of any GST payable).

Expenditure Budget	(\$)
Cost of capital and relisting	200,000
Review and Evaluation of new Business Opportunities	50,000
Investments	950,000
Administration Costs	150,000
General Working Capital	150,000
Total funds utilised	\$1,500,000

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7. PROPOSED BUSINESS STRATEGY

Please refer to an extract from the Company's Prospectus dated 3rd February 2015 outlining the Company's future business plans.

7.1 Future Business Plans

(a) Retained Assets

On the completion of the recapitalisation of the Company, the Company will retain the following assets:

- its 24.54% shareholding interest in Bluefish; and
- its status on the ASX as a Listed Investment Company.

The potential of Bluefish is discussed in more detail below. However the Company's key plan is to continue as a LIC, and to seek additional investment opportunities in a variety of asset classes, be they in listed or unlisted companies, in which it either believes they are significantly undervalued, or where it believes it can add value through investment and management expertise.

(b) Bluefish Shareholding

At the date of the Appointment of the Administrator, FGF held 68,192,759 shares in Bluefish and had advanced secured funds totalling approximately \$530,000 to Bluefish.

The Administrator, in his report to Creditors of 19 January 2012, deemed the realisation of the asset at a reasonable value unlikely as:

- Bluefish was then trading unprofitably and in the event that it was required to liquidate its assets would be unlikely to raise sufficient funds to repay its creditors' in full;
- The Secured loan was part of a syndicated loan to Bluefish from FGF and other shareholders such that there was no provision whereby FGF may demand repayment of that loan;
- It would be difficult to identify a buyer for FGF's shareholding in that environment, having regard to Bluefish's trading history and debt;
- The existing shareholders enjoy pre-emptive rights over each other's shareholdings in Bluefish.

Prior to issuing the report the working capital requirements of Bluefish became critical and a proposal was put to all secured creditors of Bluefish to convert their secured debt to equity in order for Bluefish to seek and obtain a further injection of capital from a new investor.

All secured creditors of Bluefish agreed at this point and FGF was issued with a further 478,607,120 shares in Bluefish. As it had a larger proportion of secured debt relative to its equity interest at that point it increased its interest in Bluefish from 33.66% to 36.75%.

Bluefish, with the Administrators approval, then introduced a new cornerstone investor being VITEC Multimedia of France, a company with a long history in electronic media dating back to 1988. VITEC invested \$250,000 for a 17% interest in Bluefish, with an option to move to 49% of Bluefish through the payment of a further \$950,000 in certain tranches.

Since that initial \$250,000 investment in Bluefish, VITEC have invested a further \$250,000 in May of 2012 and \$100,000 in July 2012. As a result of these investments FGF has retained its interest in 516,799,879 shares in Bluefish, which has been diluted to

24.54% of the issued capital of Bluefish. VITEC now hold 699,723,444 (33.23%) of Bluefish and have the right to acquire up to 49.95% of the Company.

The investment of VITEC attributes a value of \$440,000 to the FGF shareholding in Bluefish.

VITEC are seen as a valuable and significant equity partner in the Bluefish business and one that should assist the Company to increase and unlock the value of its Bluefish investment in the future.

FGF's interest in Bluefish has always been passive. That will not change into the future, with VITEC demonstrating its willingness to fund the Bluefish business plan by having exercised part of its option to increase its shareholding from 17% to 33% and particularly more so if it increases its interest to 49.95%.

The Directors of FGF intend to maintain a passive, but supportive, role in respect of Bluefish, and anticipate that VITEC will take the key funding role to assist Bluefish execute its business plan, particularly as it has the option to increase its shareholding to 49.95%.

The Company will be willing to provide financial support to Bluefish consistent with its shareholding if it is requested by Bluefish, if the investment requirement satisfies the Board of FGF and if FGF has the necessary resources to do so.

However, the Directors cannot guarantee what, if any, additional developmental support and funding VITEC will provide Bluefish other than as disclosed above, and that any support or funding provided will result in a benefit to the Company. Further, the Directors cannot accurately anticipate the funding that the Company may be required to provide Bluefish for working capital needs. Accordingly, there is no assurance that the Company will receive any return on this investment.

(c) Listed Investment Company ("LIC")

LICs provide investors with exposure to an ASX traded entity with a professionally managed and diversified portfolio of assets. These assets may include Australian shares, international shares, fixed income securities, property, with some funds offering 'packaged strategies'.

An investor's exposure is very similar to a traditional managed fund. On recapitalisation and reinstatement to trading, FGF will continue to seek investment opportunities and to invest in businesses and equities in accordance with its long term business model as a LIC. The Company through the re-capitalisation process will have enough capital to achieve these outcomes.

Its specific plan is to seek small investments, not greater than \$500,000, in unlisted entities that it deems have significant upside and have the potential to be listed. As such it proposes to act as an incubator for small companies that can then be taken to a Stock Exchange Listing, and then to support those companies post Stock Exchange Listing.

The analysis undertaken by FGF typically will include:

- an assessment of the past and projected revenue, costs and profits of the company;
- the nature of the assets of the business and the appropriateness of assigned values;
- the mix between tangible and intangible assets;
- the cash flow profile of the business;
- the present value of the anticipated cash flow;
- the projected earnings and cash flow per share;

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- an assessment of various parameters to determine an appropriate value, including rate of return on equity employed, price to earnings ratio, price to book value and the internal rate of return over the short, medium and long term;
- the amount of capital expenditure required (if any); and
- an assessment of the management team in place and its ability to deliver on the company's objectives.

After completing the above analysis, a set of recommendations are considered by the Board in the context of the overall equity environment. The Board will then review the Company's current portfolio in light of the information presented to it and adjust holdings in the portfolio to ensure the targeted performance is achieved.

The Company, via its arrangement with Peloton Capital Pty Ltd as an Australian Financial Services Licence holder, may invest in the following types of investments:

- listed securities;
- unlisted securities;
- alternative investments;
- rights to subscribe for or convert to unlisted securities (whether or not such rights are tradeable on a securities exchange);
- warrants or options to purchase any investment and warrants or options to sell any investment;
- discount or purchase of bills of exchange, promissory notes or other negotiable instruments accepted, drawn or endorsed by any bank or by the Commonwealth of Australia, any State or Territory of Australia, or by any corporation of at least an investment grade credit rating granted by a recognised credit rating agency in Australia;
- deposits with any bank or corporation declared to be an authorised dealer in the short-term money market;
- debentures, unsecured notes, loan stock, bonds, promissory notes, certificates of deposit, interest bearing accounts, certificates of indebtedness issued by any bank or by the Commonwealth of Australia, any State or Territory of Australia, or any Australian government authority, or, if authorised by its Directors, a corporation of at least an investment grade credit rating granted by a recognised credit rating agency in Australia;
- units or other interest in cash management trusts; and
- any other investment, or investment of a particular kind, approved by the Board in writing.

The recent history of FGF as an investment company has seen it investing predominantly in unlisted technology based startup companies, though with a wide array of operational interests, such as e commerce, telephony, carbon and digital video.

FGF into the future does not intend to limit its investments to any one sector.

The key investment criteria are whether or not the investment presented is of a suitable scale, and quality that it is likely to achieve a significant increase in value for the shareholders of FGF.

It is the intent of the Board to appoint an Investment Manager once the Company has been reinstated to trading.

(d) **Secured Creditor**

At the date of being placed under Administration, the Company was indebted to the Secured Creditor, as accepted by the Administrator, in the amount of \$1,371,884.82. Pursuant to the terms of the DOCA and the Reconstruction Deed, and following shareholder approval, the Secured Creditor agreed to the following arrangement in respect of this debt:

- The Secured Creditor would discharge and release its registered fixed and floating charge (ASIC registration number 1586961) over the Company's assets.
- In substitution for the above fixed and floating charge, the Company was to:
 - Issue the Secured Creditor or nominees 50 million shares in FGF; and
 - grant the Secured Creditor a security interest in the Bluefish shares held by the Company as collateral for repayment of the moneys owed to the Secured Creditor, limited to \$800,000 ("Security Interest") as well as 50% of any proceeds from the Bluefish shares over and above the \$800,000 (see below). Importantly, the Security Interest does not encumber the other assets of the Company other than the Bluefish shareholding and the Secured Creditor has no rights to any other asset of the Company.
- Any dividends paid, or any other fee, consideration or other amount received from or in respect of Bluefish, including any sale consideration received by the Company arising from a sale of Bluefish shares, are to be paid to the Secured Creditor as follows:
 - up to the amount of \$800,000 after which the Secured Creditor must deregister the Security Interest; and
 - 50% of any further value received by FGF for the sale. For example if a sale was achieved of \$1.0 million for the FGF interest in Bluefish, then the Secured Creditor would receive \$800,000 plus 50% of \$200,000 for a total of \$900,000. The remaining \$100,000 would be received by the Company.
- There is no requirement for the Company to contemplate selling its interest in Bluefish for an initial period of 9 months from Reinstatement.
- After a period of 9 months from Reinstatement, the Secured Creditor may compel the Company to either sell its Bluefish shares or pay to the Secured Creditor the balance of the amount secured by the Security Interest.
- If the Company does not sell, or is not able to sell, the Bluefish shares, and if the Company does not wish to pay the Secured Creditor the Security Interest, then the Company can transfer its interests in Bluefish to the Secured Creditor, subject to shareholder pre-emptive rights.
- The Secured Creditor must release the Company from all Claims other than in respect of its rights under the Security Interest.
- It is important to note that the Company's liability in respect of this asset is limited to the sale value of the Bluefish shares and to \$800,000. If the shares are eventually sold for a lesser figure than the \$800,000, with approval of, or demand from, the Secured Creditor, then the Company will have no further liability to the Secured Creditor.

As such, the Company's principal asset (i.e. Bluefish shares) following recapitalisation will be subject to a registered security and the Company may eventually be required to liquidate that asset (or chose to pay the sum of \$800,000) on demand by the Secured Creditor. Accordingly, the Company's tenure over the Bluefish shares is not absolute

and the Company will not receive dividends or other distributions from those shares until it has repaid the \$800,000 liability to the Secured Creditor.

To allow the Company to remove the Administrators and to be returned to control of shareholders and the Board, the Secured Creditor has relinquished its fixed and floating Charge over the assets of the Company, and now has specific security over the asset of the Bluefish shares.

7.2 Permitted Investments

The Board may invest in the following types of investments on behalf of the Company:

- (a) securities, derivatives (including fully deliverable commodity or real property derivatives) and foreign exchange (including foreign exchange contracts that are settled immediately);
- (b) rights to subscribe for or convert to securities, derivatives (including fully deliverable commodity or real property derivatives) and foreign exchange (including foreign exchange contracts that are settled immediately) whether or not such rights are tradable on a securities exchange;
- (c) securities, derivatives (including fully deliverable commodity or real property derivatives) and foreign exchange (including foreign exchange contracts that are settled immediately) for the purpose of short selling;
- (d) warrants or options to purchase any investment and warrants or options to sell any investment permitted pursuant to the Board's approval as detailed above;
- (e) discount or purchase of bills of exchange, promissory notes or other negotiable instruments accepted, drawn or endorsed by any bank or by any corporation;
- (f) deposits with any bank or corporation declared to be an authorised dealer in the short-term money market; and
- (g) units or other interests in cash management trusts.

7.3 Risk Control

Performance of the investment transactions and diversification of holdings is used with the intention of limiting risk. Risk control features include:

- no one investment transaction, except as noted in clause (e) and (f) will represent more than 20% of the total Pre-Tax NAV at the time of acquisition;
- no investment, except as noted in clause (f), will represent more than a 20% stake in the issued securities of a company at the time of acquisition;
- total unlisted investment transactions at the time of acquisition of any of the unlisted investments cannot exceed 50% of the Pre-Tax NAV as measured by cost / Pre-Tax NAV;
- where suitable investments cannot be identified, the Company may be invested in cash. Whilst unlikely over the medium term, the Company may consist from time to time of significant cash deposits;
- there are no limitations on short positions; and
- gearing may be employed in the Portfolio, but total exposure will not exceed 3 times as measured by aggregate absolute mark-to-market value of all open investment transactions divided by the Pre-Tax NAV.

The Board typically manages market risk by ensuring that any exposure will be established within predefined trading limits and marked to market with a full revaluation on a daily basis. Overall market risk limits are typically determined by reference to in-house Value-at-Risk (**VAR**) based

calculations, which is a technique used to estimate the probability of portfolio losses based on the statistical analysis of historical portfolio performance and volatilities.

The Board plans to appoint a suitable investment manager once it has reinstated to trading on the ASX.

7.4 Investment Strategy

The Board's investment strategy is to invest in a combination of value and growth stocks both listed and unlisted, and managing the market risk and tax on those investments by hedging some of the market and commodity exposures in the resulting portfolio.

- A **value** stock means shares in a company that is considered to be trading at a low price relative to its fundamentals (dividends, earnings power, book value, or replacement value) and is therefore considered undervalued by the manager. Common characteristics of such stocks include a high dividend yield, low price-to-book ratio and/or low price-to-earnings ratio.
- A **growth** stock means shares in a company whose earnings are expected to grow at an above-average rate relative to the market. A growth stock often does not pay a dividend, as the company would prefer to reinvest retained earnings in capital projects.

The Board Members have, on a number of occasions, been an early investor in the pre-feasibility and often pre-IPO stages for Australian resources sector companies through opportunities such as rights issues, private placements, private equity and convertible notes.

A variety of investment strategies will be utilised by the Company, which may also change its investment strategies to take advantage of opportunities in other sectors outside of the commodities sector and the Australian resources sector.

7.5 Dividends

The Company intends to pay dividends from its retained earnings to the extent permitted by law and prudent business practice.

7.6 Returns and Future Performance

The Directors make no guarantees with respect to the Company's future performance.

Investors should also note that an investment in the Company is subject to a number of risk factors and that the market price of investments that the Company holds may fall as well as rise, for example due to market conditions, and accordingly this may impact on the Company's investment returns. These risk factors are set out in **Section Error! Reference source not found.**

7.7 Forecasts

The Directors have considered ASIC Regulatory Guide 170 and do not believe that they have a reasonable basis to forecast future earnings of the Company as they are inherently uncertain. Accordingly, any forecast or projection would contain such a broad range of potential outcomes and possibilities that it is not possible to propose a reliable best estimate forecast or projection.

7.8 Performance Reporting

The Company will publish on its website, and release to the ASX as required, a statement of the Pre-Tax Net Asset Value and After-Tax NAV per Share as at the end of each month within fifteen (15) days of the end of the relevant month.

8. SUMMARY OF AUDIT QUALIFICATIONS

The Company's most recent financial statements for the year ended 30 June 2014 were qualified by the auditor. The basis for the qualifications is as follows:

- The auditor was not able to obtain sufficient audit evidence to be satisfied with the share of the associate's (Bluefish Technologies Pty Ltd) profit reported in the Statement of profit or loss and other comprehensive income, nor with the appropriateness of the carrying value of the investment.
- At 30 June 2014, 3 subsidiaries, relating to overseas operations that ceased trading prior to First Growth Funds Limited being placed in administration, had not, to the auditor's satisfaction, been confirmed to be dormant and to have no liabilities.

The FGF directors position in respect of each qualification is:

- The Bluefish asset is secured against the \$800,000 liability disclosed in the financial report. The directors will take action to ensure in future the equity accounting disclosures can be verified.
- The directors are satisfied the overseas entities are dormant and will commence action to have them deregistered.

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11th February 2015

Company Announcements Office
Australian Securities Exchange
10th Floor
20 Bond Street
SYDNEY NSW 2000

Dear Sir

COMPLIANCE WITH ASX LISTING RULES AND CONFIRMATION OF REGISTERED OFFICE AND COMPANY OFFICERS

- 1) We confirm that First Growth Funds is in compliance with the Listing Rules; and in particular Listing Rule 3.1;
- 2) We confirm the Company's registered office is as set out below:

**Level 5
56 Pitt Street
Sydney NSW 2000
Contact: Mr Geoff Barnes
Telephone: (02) 8651 7800
Email: Geoff.Barnes@pelotoncapital.com.au
Fax (02) 9241 6199**

- 3) We confirm the company's directors and company secretary as set out below and the Company is in compliance with Section 201A(2) of the Corporations Act:

Directors

**Mr Geoff Barnes (Non-Executive Chairman)
Mr Athan Lekkas (Non-Executive Director)
Mr Joe Calabria (Non-Executive Director)
Mr Michael Clarke (Non-Executive Director)**

Company Secretary

Mr Michael Clarke

- 4) We Confirm that Mr Geoff Barnes and Mr Michael Clarke will be the persons responsible for communication with ASX in relation to ASX Listing Rule matters:

Yours sincerely,

Geoff Barnes
Chairman